

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NATHAN ROBERTS, et al.)	CASE NO. 1:23CV1597
)	
Plaintiffs)	JUDGE PATRICIA A. GAUGHAN
)	
v.)	Magistrate Judge James E. Grimes, Jr.
)	
PROGRESSIVE PREFERRED)	<u>JOINT STIPULATION TO EXTEND</u>
INSURANCE COMPANY, et al.)	<u>DEADLINES AND JOINT MOTION TO</u>
)	<u>TO RESCHEDULE JANUARY 25, 2024</u>
)	<u>CASE MANAGEMENT CONFERENCE</u>
Defendants)	

Plaintiffs Nathan Roberts and Freedom Truck Dispatch LLC (collectively, “Plaintiffs”) and Defendants Progressive Insurance Company, Progressive Casualty Insurance Company, and Circular Board Inc. (collectively, “Defendants”) have jointly agreed to extend the following deadlines (subject to this Court’s approval):

- Motions to Dismiss Amended Complaint will be due on **February 7, 2024**
- Response in Opposition to Motions to Dismiss Due on **March 22, 2024**
- Replies in Support of Motions to Dismiss Due on **April 19, 2024**

All parties have agreed to the aforementioned dates. None of the parties will be prejudiced by the requested extensions, and there will be no undue delay of this case. The parties therefore respectfully request that the Court approve this Joint Stipulation and enter the agreed briefing schedule.

The parties further respectfully request that the Case Management Conference, currently scheduled for January 25, 2024, be rescheduled for the week of March 11, 2024 (subject to the Court’s availability) or a contemporaneous date that is convenient for the Court.

Respectfully submitted,

/s/ Joseph P. Ashbrook (per consent)

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of January, 2024, a copy of this Joint Stipulation to Extend Deadlines was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Dolores P. Garcia
*One of the Attorneys for Defendant
Circular Board Inc.*